

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No. 13 CR 328

v.

)
)
) Violations: Title 18, United States
) Code, Sections 1001(a)(2) and
) 2339B(a)(1)

JUDGE DER-YEGHIAYAN

ABDELLA AHMAD TOUNISI) INDICTMENT

COUNT ONE

MAGISTRATE JUDGE MARTIN

The SPECIAL JANUARY 2012 GRAND JURY charges:

1. At all times material to this indictment:

a. Al-Qaida in Iraq was a foreign terrorist organization, first designated by the United States Secretary of State as such on or about October 15, 2004.

b. On or about December 11, 2012, that designation was amended to include the alias Jabhat al-Nusrah, and remained so through the date of the return of this indictment.

FILED

MAY 16 2013

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

2. Beginning no later than in or around January 2013, and continuing until on or about April 19, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABDELLA AHMAD TOUNISI,

defendant herein, knowingly attempted to provide material support and resources, namely, personnel, to al-Qaida in Iraq, also known as Jabhat al-Nusrah, knowing that it was designated a foreign terrorist organization and that the organization had engaged and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

The SPECIAL JANUARY 2012 GRAND JURY further charges:

On or about April 19, 2013, at Chicago, in the Northern District of Illinois, Eastern Division,

ABDELLA AHMAD TOUNISI,

defendant herein, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of U.S. Customs and Border Protection (CBP), an agency within the executive branch of the Government of the United States, which statements and representations involved international terrorism, in that defendant, when interviewed by officers of CBP regarding his purpose and plans for traveling to Turkey on or about April 19, 2013, stated in sum and substance that:

- (a) Defendant's purpose for traveling to Turkey was sightseeing; and
- (b) Defendant did not plan to visit any other countries during his travel to Turkey.

When in truth and fact, as defendant then well knew, these statements were false;

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY